

Exhibit 12

Page 1

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
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5
6 IN RE: NATIONAL PRESCRIPTION MDL No. 2804
7 OPIATE LITIGATION

8
9 Case No.
10 17-md-2804

11 Judge Dan Aaron
12 Polster

13 This document relates to:

14 The County of Summit, Ohio, et al. v. Purdue
15 Pharma L.P., et al., Case No. 18-OP-45090

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17 Videotaped Deposition of
18 GRETA JOHNSON, 30(b)(6)

19 January 15, 2019

20 8:30 a.m.

21 Taken at:

22 Sheraton Suites Akron
23 1989 Front Street - Portage Room
24 Cuyahoga Falls, Ohio

25 Stephen J. DeBacco, RPR

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14 EXHIBIT CUSTODY

15 EXHIBITS RETAINED BY THE COURT REPORTER

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1 epidemic?

2 A. It has become sort of this
3 stepsister to the epidemic because of the
4 shifts in the way people are using opioids.
5 Cocaine has been used more recently in
6 conjunction with opioids.

7 Q. Is -- in your understanding, is the
8 opioid epidemic what this lawsuit is about?

9 A. This lawsuit is -- is about the
10 aggregate harm that's been caused by the
11 manufacture and distribution of opioids into
12 our community.

13 Q. When did the opioid epidemic begin?

14 A. Opioids have always been in our
15 community, but I believe we really saw an
16 uptick in the presence of diverted pills and
17 use really started to come along in the late
18 2000s.

19 And certainly we noticed that in
20 the prosecutor's office where folks were being
21 arrested and having one or two pills in their
22 pocket, folks were being arrested for deception
23 to obtain a dangerous drug or forging drug
24 documents. We started to see that uptick in
25 the late -- in the late 2000s.

1 was a problem?

2 A. Personally? I first became aware
3 that there was a real difference in some of the
4 cases I was seeing. I was seeing, instead of
5 detectives who were bringing in crack cases or
6 things like that, we started to see a lot of
7 pill cases; a lot of defendants without a prior
8 record, being arrested for possession of
9 oxycodone, OxyContin, Percocets. And we
10 started to see, in the late 2000s, this
11 increase in cases of deception to obtain and
12 forging drug documents.

13 These folks had become so addicted
14 that they were resorting to, you know, trying
15 to write false prescriptions, trying to obtain
16 these pills in a different manner.

17 Q. And when was it that you started
18 seeing this?

19 A. In the late 2000s is really --
20 Q. 2007? 2008? Somewhere in there?
21 A. I -- I remember it steadily
22 growing. I can recall being -- in 2009, I was
23 the grand jury prosecutor, and I recall seeing
24 many of those cases in sort of a way that I had
25 not previously.

1 Q. Do you think, at the time that you
2 personally perceived that there was a problem,
3 do you think that generally there was an
4 understanding in Summit County at that time
5 that there was a problem?

6 A. Calling it a problem, I think at
7 that time, as a prosecutor, I was aware that
8 this was a change that we were perceiving. I
9 think at that time the ADM Board and Summit
10 County Public Health started to perceive that
11 the people seeking treatment were coming in for
12 opioid addiction in greater numbers than they
13 had previously seen. I think our hospitals saw
14 that there were more babies being born with NAS
15 than they had previously seen.

16 And at that point, I think, you
17 know, there were some -- some concerns, but not
18 a true identification of the root cause yet.

19 MS. WINNER: I'd like to ask the
20 reporter to mark as Exhibit 2 a document
21 entitled "Drug Threat Assessment, Summit
22 County, Ohio." It appears to be a 2005
23 document.

24 - - - - -

25 (Thereupon, Deposition Exhibit 2,

1 threat" says, "The diversion of narcotics and
2 pain analgesics in Summit County continues to
3 increase."

4 A. Uh-huh.

5 Q. Do you see that?

6 A. Yes, I do.

7 Q. And was that a correct statement in
8 2005?

9 A. I'm sure that it was.

10 Q. And then it then goes on to refer
11 to some of the -- the drugs --

12 A. Yes.

13 Q. -- correct?

14 And then under "Availability," he
15 goes on to say, quote, "While there are no
16 conclusive estimates as to the total amount of
17 diverted prescription narcotics, depressants,
18 and stimulants available in the drug markets of
19 Summit County, it is known that legitimate
20 commercial disbursal of prescription
21 pharmaceuticals distributed to pharmacies,
22 hospitals, and practitioners has increased
23 sharply over the past four years, thereby
24 making more of the drugs available to criminal
25 diversion and abuse."

1 Is that a correct statement, as far
2 as you were aware?

3 A. I just want to read it again. It's
4 a long sentence.

5 Q. Sure.

6 A. Yes, I would agree with that.

7 Q. So again, this is -- this is
8 information that was known to Summit County in
9 2005, correct?

10 A. Yes. We were starting to become
11 very aware that pills were beginning to flood
12 our community.

13 Q. And the next sentence goes on to
14 say, quote, "In a sampling of data from the
15 Akron Police Department's narcotics unit
16 diversion division during the first quarter of
17 2004, the unit investigated 60 new diversion
18 cases, or one case every day and a half," end
19 quote.

20 Is that an accurate statement, as
21 far as you were aware?

22 A. I assume that the Akron Police
23 narcotics unit can provide the data that would
24 back that up. I can't imagine there would be
25 any reason that Captain Baker would have